

[counsel listed on following page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ZOYA KOVALENKO,

Plaintiff,

v.

KIRKLAND & ELLIS LLP, MICHAEL DE
VRIES, MICHAEL W. DEVRIES, P.C.,
ADAM ALPER, ADAM R. ALPER, P.C.,
AKSHAY DEORAS, AKSHAY S. DEORAS,
P.C., LESLIE SCHMIDT, LESLIE M.
SCHMIDT, P.C., AND MARK FAHEY,

Defendants.

Case No. 4:22-CV-05990-HSG

**STIPULATION TO SPECIALLY SET
BREIFING SCHEDULE ON
DEFENDANTS' MOTIONS FILED IN
RESPONSE TO PLAINTIFF'S
COMPLAINT**

[N.D. CAL. CIV. L.R. 6-2]

1 LYNNE C. HERMLE (STATE BAR NO. 99779)
lchermle@orrick.com
2 JOSEPH C. LIBURT (STATE BAR NO. 155507)
jliburt@orrick.com
3 ORRICK, HERRINGTON & SUTCLIFFE LLP
1000 Marsh Road
4 Menlo Park, CA 94025-1015
Telephone: +1 650 614 7400
5 Facsimile: +1 650 614 7401

6 KATE JUVINALL (STATE BAR NO. 315659)
kjuvinall@orrick.com
7 PAUL RODRIGUEZ (STATE BAR NO. 307139)
prodriguez@orrick.com
8 ORRICK, HERRINGTON & SUTCLIFFE LLP
355 S. Grand Ave., Suite 2700
9 Los Angeles, CA 90071
Telephone: +1 213 629 2020
10 Facsimile: +1 213 612 2499

11 Attorneys for Defendants
KIRKLAND & ELLIS LLP, MICHAEL DE VRIES,
12 MICHAEL W. DE VRIES, P.C., ADAM ALPER,
ADAM R. ALPER, P.C., AKSHAY DEORAS,
13 AKSHAY S. DEORAS, P.C., LESLIE SCHMIDT,
LESLIE M. SCHMIDT, P.C., AND MARK FAHEY
14

15 Zoya Kovalenko
13221 Oakland Hills Blvd., Apt. 206
16 Germantown, MD 20874
zoyavk@outlook.com
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18 Plaintiff Zoya Kovalenko
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Plaintiff Zoya Kovalenko (“Plaintiff”) and Defendants Kirkland & Ellis LLP, Michael De Vries, Michael W. De Vries, P.C., Adam Alper, Adam R. Alper, P.C., Akshay Deoras, Akshay S. Deoras, P.C., Leslie Schmidt, Leslie M. Schmidt, P.C., and Mark Fahey (collectively “Defendants”) (Plaintiff and Defendants together, the “Parties”) hereby stipulate under Local Civil Rule 6-2 to extend the deadlines for Plaintiff to file oppositions to the responsive motions and notice to Plaintiff’s Complaint that Defendants filed on December 16 and 19, 2022, and noticed for hearing on March 30, 2023 and April 6, 2023, and to extend the deadlines for Defendants to file replies to Plaintiff’s oppositions. The motions and notice filed on December 16 and 19 are as follows:

- December 16, 2022 – Defendant Kirkland & Ellis LLP’s Motion to Dismiss
- December 19, 2022
 - Defendants’ Motion to Strike
 - Defendant Kirkland & Ellis LLP’s SLAPP Motion
 - Defendants Adam Alper and Adam R. Alper, P.C.’s Motion to Dismiss
 - Defendants Akshay Deoras and Akshay S. Deoras, P.C.’s Motion to Dismiss
 - Defendants Michael De Vries and Michael W. De Vries P.C.’s Motion to Dismiss
 - Defendant Mark Fahey’s Motion to Dismiss
 - Defendants Leslie Schmidt and Leslie M. Schmidt, P.C.’s Motion to Dismiss
 - Defendants’ Request for Judicial Notice ISO Motions to Dismiss

The parties stipulate that the following briefing schedule will govern (for the reasons set forth in the accompanying Declaration of Kate Juvinall):

- Schedule for Motion filed on December 16, 2022:
 - January 9, 2023: Plaintiff’s deadline to file opposition
 - January 23, 2023: Defendant Kirkland’s deadline to file reply
- Schedule for Motions and Notice filed on December 19, 2022:
 - January 17, 2023: Plaintiff’s deadline to file oppositions
 - January 31, 2023: Defendants’ deadline to file replies

1 Dated: December 20, 2022

ORRICK, HERRINGTON & SUTCLIFFE LLP

3 /s/ *Kate Juvinal*

4 KATE JUVINALL
Attorneys for Defendants

5 Dated: December 20, 2022

6 /s/ *Zoya Kovalenko*

7 ZOYA KOVALENKO
8 Plaintiff

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10
11 **[PROPOSED] ORDER**

12 PURSUANT TO STIPULATION, IT IS SO ORDERED.

13 DATED:

14 HAYWOOD S. GILLIAM, JR.
Unites States District Judge

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17 **LOCAL RULE 5.3(h)(3) ATTESTATION**

18 I attest that each of the other Signatories have concurred in the filing of the document.

19 /s/ *Kate Juvinal*

20 KATE JUVINALL
21 Attorneys for Defendants